## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY **CAMDEN VICINAGE**

22306

Document 1003-1

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

MDL No. 2875

Honorable Robert B. Kugler, District Court Judge

Honorable Thomas Vanaskie (Ret.), Magistrate Judge

## **DECLARATION OF KELLY A. BONNER**

- I, Kelly A. Bonner, of full age, hereby declare as follows:
- 1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, and am employed with the law firm of Duane Morris, LLP, counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Prinston Pharmaceutical Inc. ("Prinston") and Huahai U.S. Inc. ("Huahai U.S.", and collectively with ZHP and Prinston, "the ZHP Defendants").
- 2. I make this Declaration on behalf of the ZHP Defendants in support of their Reply Supporting Their Motion to Seal.
- 3. A true and correct copy of a letter from Adam Slater dated November 18, 2020 is attached hereto as Exhibit A.
- 4. True and correct copies of emails between Christopher Geddis and Jessica Priselac dated November 23, 2020 are attached hereto as Exhibit B.
- 5. True and correct copies of emails between Christopher Geddis and Jessica Priselac dated December 21, 2020 are attached hereto as Exhibit C.

- 6. A true and correct copy of an email from Christopher Geddis dated February 1, 2020 is attached hereto as **Exhibit D**.
- 7. True and correct copies of emails between Cheryl Calderone and Kelly Bonner dated February 1-2, 2021 are attached hereto as **Exhibit E**.
  - I, Kelly A. Bonner, declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2021.

/s/ Kelly A. Bonner Kelly A. Bonner, Esq.